



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

November 28, 2005

Lonnie Monaco (orlando.monaco@navy.mil)
Engineering Field Activity Northeast
Naval Facilities Engineering Command
North Loop and American Way,
Building G, Code 182
Lester, PA 19113-2090

**Re: Initial EPA Comments on the Monitoring Event 26 (April 2005) Report for Site 9, Ash
Landfill/Dump Area, dated November 2005 for the Naval Air Station Brunswick, Maine**

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency is providing initial comments, additional comments will be forthcoming.

During an October 5, 2005 site visit, EPA and DEP noticed several locations of dead vegetation along the shore of the impoundment pond on the southern end of site 9. On October 6 and again on October 20, EPA requested the Navy sample the sediment and surface water to determine the cause of the dead vegetation. The Navy refused, so the Maine Department of Environmental Protection took surface water samples on October 21, 2005; 323 ppb of acetone and 15 ppb of MEK were found in the surface water.

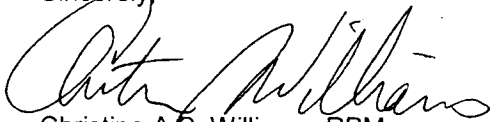
Acetone was reported in the analytical results for the wells at site 9 in both the ME#25 and ME#26 reports. Section 1.4.3 of the LTMP (October 2005) for site 9 states that wells sampled only for VOC will be sampled by the aqueous diffusion bag method. However, acetone and MEK results by the aqueous diffusion bag method are not representative of the low flow method, as is demonstrated in the USGS user's guide, <http://sc.water.usgs.gov/publications/difsamplers.html>. Therefore, it cannot be determined by recent historical data if site 9 (including the bldg 201 septic system) was the source of the contamination found in the pond that may have caused the vegetation die off.

EPA is requesting a temporary change to the LTMP for the fall 2005 event and the two events in 2006. Monitoring well locations 71, 72, 74, 75, & 76 must be sampled by the low flow method to determine a representative result for acetone and MEK in the groundwater near the impoundment pond. If the Navy would prefer to include other wells at or around site 9 in this change, that would also be acceptable.

EPA looks forward to working with the Navy to determine the origin of the acetone and MEK in the impoundment pond and believes this temporary LTMP modification request is a first step.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
David Peterson/EPA (peterson.david@epa.gov)
Bryan Olson/EPA (olson.bryan@epa.gov)
Ed Benedikt/BACSE e-mail only (rbenedik@ghi.net)
Tom Fusco/BACSE e-mail only (tfusco@ghi.net)
Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Peter Golonka/Gannet-Fleming e-mail only (pgolonka@gfnet.com)
Lisa Joy/NASB (lisa.joy@navy.mil)
Charles Porfert via e-mail only (porfert.charlie@epa.gov)